U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Orange County Metal Processing - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IX

Subject: **POLREP #3**
Progress
Orange County Metal Processing
A955
Fullerton, CA

To: Harry Allen, EPA Region 9
Daniel Meer, EPA Region 9

From: Martin Powell, On-Scene Coordinator
Date: 6/27/2014
Reporting Period: 06/22/14 - 06/28/14

1. Introduction

1.1 Background

Site Number:	A955	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	4/29/2014
Response Authority:	CERCLA	**Response Type:**	PRP Oversight
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	6/3/2014	**Start Date:**	6/3/2014
Demob Date:		**Completion Date:**	
CERCLIS ID:	A955	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Time-Critical PRP Removal Action

1.1.2 Site Description

Orange County Metal Processing (OCMP) is an abandoned metal zinc plating and anodizing business that processed parts for the automobile and computer industries. The company conducted business from approximately 1980 until 2011 at one parcel in a light industrial area of Fullerton, Orange County, California. Previous metal plating operations are believed to have been conducted at the site beginning in the 1960s.

The primary constituents of concern at OCMP include sludge's and solutions bearing cyanide, chromium, copper and zinc, and acidic and caustic compounds. The Orange County Health Care Agency (OCHCA) requested EPA's assistance with the Site on March 12, 2014.

1.1.2.1 Location

OCMP is located in a mixed commercial and industrial area at 1711 E. Kimberly Avenue, Fullerton, California in the east portion of the city of Fullerton (Latitude: 33.8638° Longitude: -117.8961°) The Site is located on the western portion (approximately 0.3 acres) of Assessor's Parcel Number (APN) 033-270-30. The larger central and eastern portion of the parcel housed the former PCA Metal Finishing, Inc. business with an address of 1726 East Rosslyn Avenue.

A stormwater channel, railroad track, Kimberly Avenue, and commercial and industrial businesses are located to the south of the Site. Rosslyn Avenue and commercial/industrial businesses are located north of the Site. The Santa Ana River, the primary surface water drainage feature in the area, is located approximately 2.5 miles east and southeast of the site.

1.1.2.2 Description of Threat

The defunct plating and anodizing facility is not maintained and operated to minimize the possibility of fire, explosion, or release of hazardous waste constituents to air, soil, or water. There is no heat detection fire alarm system, electricity or water supplied to OCMP. The site is easily accessed through open bay doors and permanent openings along the driveway/shipping area. There is open communication between the areas that house the OCMP plating lines, and adjoining businesses.

There is a large quantity of liquid and solid wastestreams that include: caustic, acidic, cyanide bearing and

metal bearing plating process solutions in unsecured and degraded plating vats along three separate plating lines and in bulk and non-bulk containers associated with the wastewater treatment system. Over 11,000 gallons of liquid wastes and 9,700 gallons of solid/sludge waste remains in at least 47 open and deteriorated vats associated with the plating lines. These volumes include incompatible acidic and cyanide bearing vat wastes located in a shared secondary containment structure. The wastewater treatment system contains thousands more gallons of contaminated solutions, sediments and sludge's. An undetermined volume of contaminated debris, sludge's, and building materials are also associated with secondary containment.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Continuing non-compliance issues, the continuing deterioration of the unmanaged facility and the accumulation of large quantities of unsecured hazardous substances led to an OCHCA request to EPA to accompany OCHCA on a March 12, 2014 follow-up inspection and assess the site for a potential federal removal action. The facility had been previously shut down by the California Department of Industrial Relations, Division of Labor Standards Enforcement and the business owner had been unable to arrange for the disposal of all remaining unsecured chemical/hazardous waste.

The EPA initiated removal assessment ran concurrent with EPA PRP investigation activities. EPA reviewed numerous documents (Administrative Record) and conducted field chemical screening, waste inventorying and laboratory sample analysis work to document the presence of CERCLA hazardous substances and RCRA hazardous wastes. The removal assessment activities were ultimately completed by contractors (Dudek/ChemPac) representing the existing property ownership trust. Key assessment and PRP investigation activities through May 2014 are summarized below:

4/2/14: On-Site meeting with EPA OSC Craig Benson, EPA CI Craig Whitenack, DTSC's George Baker, Business Owner Manual Reynoso, Property Owner Trustee Colleen Frojen, and Ms. Frojens consultants (Dudek) and Council Rick McNeil. OSC Benson explained the results of EPAs preliminary removal assessment and outlined the remaining tasks necessary to complete the assessment and subsequent removal action.

4/8/14 and 4/28/14: CERCLA General Notice Letters were delivered to PRPs.

4/29/14: EPA Action Memorandum signed.

5/9/14: CERCLA Unilateral Administrative Orders (UAO) received by PRPs.

5/13/14: OSC Benson received and approved an Initial Characterization Workplan from Dudek (representing property owner) to continue/complete the removal assessment

5/14/14 – 5/15/14: Dudek/Chempac on-site to continue field screening, sampling/analysis and waste inventory efforts. All previous EPA data and inventory results were furnished to Dudek to integrate into the completed effort. Property ownership trust awaiting a final cost estimate from contractors based on the completed assessment.

5/27/14: EPA received a Notice of Intent to Comply with the UAO issued to the property ownership trust.

5/29/14: OSC Benson approved (based on agreed upon conditions) the Waste Removal Workplan submitted by Dudek.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

6/3/14 and 6/6/14
Dudek/ChemPack personnel on-site to collect composite profile samples from select vats and wastewater treatment system tanks for off-site facility approval of proposed waststreams.

6/11/14
OSCs Benson and Powell, START, Dudek/Chempack personnel and PRP attorney R. McNeil on-site. Activities today include Dudek/Chempack equipment mobilization, vat and container coding/marking, utilities set-up, and continuation of waste profiling efforts. The EPA/START periodic oversight schedule and general project milestones were reviewed with the group. The DTSC soil vapor extraction system maintanence contractor personnel were on-site and briefed on the removal activities/schedule.

Wastestream profiles are being reviewed and are expected to be sent by Chempack to their respective off-site facilities tomorrow for final review and approval. No site work is planned for tomorrow (6/12/14) while waste profiling is finalized.

Site work for Friday (6/13/14) will involve a continuation of equipment mobilization, beginning disassembly of the wastewater treatment system (WWTS), including piping and scrap metal, and removal and consolidation of some solid wastes from the WWTS.

06/16/14 - 06/20/14
The PRP contractor team pumped out two vac truck loads (approximately 6,250 gallons total) of neutral liquids and transported to Evoqua under manifests. The PRP contractor team bulked 1500 gallons of cyanide liquids into seven chemtotes, which were staged in the south room of the facility awaiting profile acceptance from US Ecology. The PRP contractor team bulked 1,925 gallons of acidic liquids into seven chemtotes, which were staged in the north room, along the north wall. The PRP contractor team also began the demolition of the waste water treatment plant, as well as removing neutral and acidic vats from the south room.

Demolition and removal activities are expected to continue through next week. Cyanide and acidic liquids will be shipped off site once profiles are accepted. In addition, cyanide solids will be bulked into tri-wall super sacks, and debris from the vats and waste water treatment plant will be segregated into rolloff bins on site.

06/23/14 - 06/26/14

The PRP contractor team dismantled several neutral and acidic vats; the liners were placed in the appropriate waste stream bins (acid vs. neutral), and the metal vats were scraped clean. The cleaned metal vats were placed in the scrap metal bin. The PRP contractor team also bulked cyanide solid wastes, including the contents and liners of cyanide vats, into tri-fold super sacs, which were staged in the south room awaiting profile acceptance from US Ecology. Scrap metal bins were removed from the site for immediate destruction at Jack Engle, Inc. The seven totes containing acidic liquid waste, and the seven totes containing cyanide liquid waste, were transported off site in separate loads to US Ecology under two manifests.

Demolition and removal of the remaining vats is expected to continue through July 1. The remaining debris in the pit of the south room will be segregated according to the hazard class of the vats in the area. Acidic, Neutral, and cyanide solid waste streams are expected to leave the site on, or about, Tuesday, July 1, 2014. Dudek, on behalf of the PRP, is expected to request a time extension to the UAO for the purpose of planning and executing post-removal sampling of near-surface soils under areas where the concrete floor has been compromised.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Three PRPs received CERCLA General Notice Letters and a CERCLA UAO. The property ownership trust has been a responsive PRP and is currently complying with the terms of the UAO. All phases of the removal will be approved and overseen by EPA.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

2.2.2 Issues

Numerous limited subsurface environmental investigations have been conducted at OCMP and adjoining former PCA property since 1990. In 2007, DTSC conducted a Phase I Environmental Assessment Verification of the OCMP property. Results of this Phase 1 Verification suggested that volatile organic compounds (VOCs) tetrachloroethylene (PCE) and trichloroethylene (TCE) were potential constituents of concern in soil gas and in groundwater at/around the property. DTSC began using State Orphan Funds (Hazardous Substances Cleanup Account) to further investigate and eventually begin subsurface remediation at the Site.

A soil, soil vapor, and groundwater investigation was conducted by DTSC's Brownfield and Environmental Restoration Program (Cleanup Program) in 2012 to identify the areas where VOCs were present in the subsurface and to get a general understanding of groundwater contamination levels Soil gas and groundwater sample results confirmed that PCE and TCE are the primary VOCs present however, a source area for the VOCs was not identified and the lateral and vertical extent of VOCs was not delineated based on the data obtained. Concentrations of metals in groundwater and soil samples were within the background ranges and did not indicate metal impacts to soil or groundwater from site operations.

DTSC's effort ultimately resulted in the installation of a Soil Vapor Extraction (SVE) system that encompasses both the former PCA facility and OCMP property. The SVE system has been operated intermittently by DTSC since May 2012. In the meantime, DTSC has conducted additional investigation at the PCA facility and has also brought on additional extraction wells to feed into the SVE system. The aboveground components of the SVE system involve a trailer mounted high vacuum blower staged near the south anodizing line and piping runs from extraction wells to a knockout tank and dual 2000 pound vapor phase granular activated carbon vessels connected in series in proximity to the wastewater treatment system.

According to the DTSC Cleanup Program Project Managers, from this point forward, PCA and OCMP will be considered as one large site for subsurface cleanup purposes due to the location of the plume. Currently, there is a groundwater pilot test being evaluated by DTSC to assess the feasibility of implementing a groundwater remedy at the site. There are already plans to expand the SVE system to accommodate areas where the radius of influence for extraction is not reachable.

The DTSC sponsored subsurface investigation and remediation effort is an area wide effort and is not necessarily related to past or on-going practices at the OCMP. It is summarized here as the above ground

features of the SVE system and the numerous groundwater monitoring, soil vapor and soil boring installations are key characteristics of the site today. In addition, the DTSC ISE and use of State Orphan Funds is intended only for subsurface remediation issues.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.